

### **REMARKS**

Applicant respectfully requests reconsideration of this application in view of the foregoing amendments and the following remarks.

#### **Status of the Claims**

Claims 1-61 are pending in this application. Claims 9-29 and 37-61 have been withdrawn from consideration. Of the remaining claims for consideration (i.e., claims 1-8 and 30-36), claims 1 and 30 are independent.

#### **Rejection under 35 U.S.C. §103**

Claims 1-7 and 30-36 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,774,565 to Freeman ("Freeman") in view of U.S. Patent No. 5,463,419 to Saito ("Saito"). Claim 8 has also been rejected under 35 U.S.C. § 103(a) as being unpatentable over Freeman in view of Saito and further in view of Applicant's conceded prior art.

Independent claim 1 is an apparatus claim and independent claim 30 is a method claim corresponding to claim 1.

Amended claim 1 recites a gamma conversion unit (11) configured to perform a gamma conversion on the image data generated by said color interpolation unit (9). Claim 1 also recites that the color space conversion unit (12) is arranged between the gamma conversion unit (11) and the pseudo color removing unit (13a, 13b), and the thinning unit (15) is arranged between the pseudo color removing unit (13a, 13b) and the compression unit (16). See Fig. 1.

Neither Freeman nor Saito discloses a gamma conversion unit (step), or that the color space conversion unit is arranged between the gamma conversion unit and the pseudo color

removing unit. In addition, neither reference discloses that the thinning unit is arranged between the pseudo color removing unit and the compression unit.

According to the independent claims, the gamma conversion is implemented prior to the color space conversion and the pseudo color removing. Thus, the color planes of the image data, whose number of bits has been reduced, is converted and then the pseudo color components of the converted image data are reduced. Accordingly, the load of the color space conversion, the pseudo color removing, the thinning process and the compression can be reduced.

Further, the pseudo color removing process is implemented prior to the thinning and compression process. Thus, the pseudo color components of the image data do not affect the succeeding thinning and compression process to prevent degradation of the image.

Accordingly, each of claims 1 and 30 is neither anticipated by nor rendered obvious in view of Freeman and Saito, either taken alone or in combination, for at least the reasons discussed above.

Reconsideration and withdrawal of the rejections of claims 1 and 30 under 35 U.S.C. §103(a) is respectfully requested.

Applicant has not individually addressed the rejections of the dependent claims because the independent claims from which they respectively depend are in condition for allowance as set forth above. Applicant however reserves the right to address such rejections of the dependent claims should such be necessary.

Applicant believes that the application is in condition for allowance and such action is respectfully requested.


**AUTHORIZATION**

No petitions or additional fees are believed due for this amendment and/or any accompanying submissions. However, to the extent that any additional fees and/or petition is required, including a petition for extension of time, Applicant hereby petitions the Commissioner to grant such petition, and hereby authorizes the Commissioner to charge any additional fees, including any fees that may be required for such petition, or credit any overpayment to Deposit Account No. 13-4500 (Order No. 1232-4607). A DUPLICATE COPY OF THIS SHEET IS ENCLOSED.

An early and favorable examination on the merits is respectfully requested.

Respectfully submitted,  
MORGAN & FINNEGAN LLP

Dated: February 14, 2005

By:   
Richard W. Erwine  
Registration No. 41,737

CORRESPONDENCE ADDRESS:  
MORGAN & FINNEGAN L.L.P.  
3 World Financial Center  
New York, New York 10281-2101  
(212) 415-8700 Telephone  
(212) 415-8701 Facsimile